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Attorneys for Defendants

Andrew Reberry and Jeffrey C. Reberry

**IN THE UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF CALIFORNIA**

MEDICINA MEXICO, SA DE CV, A  
MEXICAN CORPORATION

PLAINTIFF,

v.

ROBERTO JIMENEZ, et al.,

DEFENDANTS.

Case No. 3:14-cv-02757 BAS RBB

Assigned To Hon. Cynthia Bashant

**JOINT MOTION TO EXTEND TIME  
TO RESPOND TO COMPLAINT**

[NO HEARING REQUIRED]

Action Filed: November 19, 2014

Current Date: December 12, 2014

New Response Date: January 12, 2015

1 Plaintiff Medicina Mexico, SA de CV (“Plaintiff”) and Defendants Andrew  
2 Reberry and Jeffrey C. Reberry (“Defendants”) jointly move the Court under Local  
3 Rules 12.1 and 7.2 for an order extending the time for Defendants to respond to  
4 Plaintiff’s Complaint. Plaintiff and Defendants respectfully request that  
5 Defendants’ current response date of December 12, 2014 be extended by thirty (30)  
6 days, up to and including January 12, 2015. This Joint Motion is based on the  
7 following facts that demonstrate good cause for granting the requested extension:

- 8 1. Plaintiff filed the Complaint on November 19, 2014.
- 9 2. Defendants were served with the Summons and Complaint on  
10 November 21, 2014 and their current response date is December 12, 2014.
- 11 3. Defendants only recently retained undersigned counsel in connection  
12 with this matter and the Parties are engaged in settlement discussions which they  
13 anticipate will render a response to the Complaint by Defendants unnecessary and  
14 will result in the dismissal of all named defendants except defendant Roberto  
15 Jimenez.
- 16 4. The length of the requested extension is reasonable in light of the above  
17 circumstances and the procedural posture of the case. The Parties do not seek to  
18 delay the litigation and agree that they will not suffer any prejudice as a result of the  
19 requested extension.
- 20 5. This Joint Motion has no impact on Plaintiff’s claims against defendant  
21 Roberto Jimenez or his deadline to respond to Plaintiff’s Complaint. The remaining  
22 defendants in this action have not yet been served.

23  
24 Therefore, the Parties jointly request that the Court grant a 30-day extension  
25 of time for Defendants to respond to the Complaint, up to and including, January 12,  
26 2015.

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1 Nothing in this stipulation shall constitute a waiver of any arguments or  
2 defenses that Defendants may seek to assert in their responsive pleadings, all of  
3 which are expressly reserved.

4 Dated: December 11, 2014

**W. MICHAEL MAYOCK**

By: /s/ W. Michael Mayock

6 Attorney for Plaintiff  
7 Medicina Mexico, SA de CV

8  
9 Dated: December 11, 2014

**BRYAN CAVE LLP**

10 By: /s/ Nancy Franco  
11 Nancy Franco

12 Attorneys for Defendants  
13 Andrew Reberry and Jeffrey C. Reberry  
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**PROOF OF SERVICE**

1013 A(3) CCP REVISED 5/1/88

STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

I am employed in the County of Los Angeles, State of California. I am over the age of 18 and not a party to the within action. My business address is 120 Broadway, Suite 300, Santa Monica, CA 90401-2386.

On December 11, 2014, I served the foregoing document described as **JOINT MOTION TO EXTEND TIME TO RESPOND TO COMPLAINT** on the interested party in this action by placing a true and correct copy thereof enclosed in a sealed envelope addressed as follows:

☒ BY CM/ECF NOTICE OF ELECTRONIC FILING: I caused said document(s) to be served by means of this Court's electronic transmission of the Notice of Electronic filing through the Court's transmission facilities, to the parties and/or counsel who are registered CM/ECF Users set forth in the service list obtained from this Court. Determined that the following person(s) are on the Electronic Mail Notice List to receive NEF transmission at the email address(es) indicated below:

- W. Michael Mayock  
mayocklaw@sbcglobal.net, rc\_case@yahoo.com

☐ BY MAIL: I am "readily familiar" with the firm's practice of collection and processing correspondence for mailing. Under that practice it would be deposited with U.S. postal service on that same day with postage thereon fully prepaid at Santa Monica, California in the ordinary course of business. I am aware that on motion of the party served, service is presumed invalid if postal cancellation date or postage meter date is more than one day after date of deposit for mailing in affidavit.

☐ (VIA EMAIL): I communicated such document via email to the email addresses as indicated as

☐ BY PERSONAL SERVICE: I caused the above-mentioned document to be personally served to the offices of the addressee.

☐ BY FACSIMILE: I communicated such document via facsimile to the addressee as indicated on the attached service list.

☐ BY FEDERAL EXPRESS: I caused said document to be sent via Federal Express to the addressee as indicated on the attached service list.

Executed on December 11, 2014, at Santa Monica, California.

☐ (STATE) I declare under penalty of perjury the laws of the State of California that the above is true and correct.

☒ (FEDERAL) I declare that I am employed in the office of a member of the bar of this court at whose direction the service was made.

*/s/ Raul Morales*

Raul Morales